

Dean M. Harvey (SBN 250298)
Katherine C. Lubin (SBN 259826)
Adam Gitlin (SBN 317047)
Yaman Salahi (SBN 288752)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
dharvey@lchb.com
kbenson@lchb.com
agitlin@lchb.com
ysalahi@lchb.com

*Attorneys for individual and representative
Plaintiffs Shonetta Crain and Kira Serna*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHONETTA CRAIN AND KIRA SERNA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ACCREDITED CASUALTY AND SURETY
COMPANY, INC., et al.,

Defendants.

Case No. 3:19-CV-001265-JST

CLASS ACTION

**DECLARATION OF JULIAN HAMMOND
IN SUPPORT OF PLAINTIFFS' JOINT
MOTION FOR APPOINTMENT OF
INTERIM CLASS COUNSEL**

Date: June 6, 2019

Time: 2:00p.m.

Location: Courtroom 9

Judge: The Honorable Jon S. Tigar

STEVEN BREAUX, individually and on
behalf of all other similar situated individuals,

Plaintiff,

v.

ACCREDITED CASUALTY AND SURETY
COMPANY, INC., et al.,

Defendants.

Case No. 3:19-CV-00717-JST

1 I, JULIAN HAMMOND, declare as follows:

2 1. I am the founding shareholder of HammondLaw, P.C. ("HammondLaw"), co-counsel
3 for Plaintiff Stephen Breaux ("Plaintiff"), with Goldstein Borgen Dardarian & Ho. I am a member in
4 good standing of the State Bar of California and admitted to practice in this District. I submit this
5 Declaration in Support of the Joint Motion For Appointment of Interim Co-Lead Class Counsel.

6 2. I have prosecuted complex class action litigation on behalf of plaintiffs since becoming
7 a member of the bar in 2008. Since founding HammondLaw in 2010, I have been appointed class
8 counsel in numerous class actions in California state and federal courts including the following cases
9 where class certification was contested:

- 10 • *Siciliano et al. v. Apple*, Case No. 1-13-cv-257676 (Cal. Sup. Ct. Santa Clara Cty. April
11 21, 2017) (certifying HammondLaw as co-class counsel in Cal. Bus. Prof. Code §§
12 17603, 17200, and 17535 claims on behalf of 3.9 million California subscribers to
13 Apple InApp subscriptions);
- 14 • *Moss et al. v. USF Reddaway, Inc.*, Case No. 5:15-cv-01541 (C.D. Cal. June 30, 2017)
15 (certifying HammondLaw as co-class counsel in Labor Code §§ 1194, 226, 226.7, and
16 201-203 putative class action on behalf of approximately 538 truck drivers); and
- *Martinez v. Knight Transportation*, Case No. 1:16-cv-01730 (E.D. Cal. November 30,
2018) (certifying HammondLaw as co-class counsel in Labor Code §§ 1194, 226,
226.2, 226.7, 2802, and 2699 putative class action on behalf of approximately 5,400
truck drivers).

17 A copy of my firm resume is attached as Exhibit A.

18 3. HammondLaw has worked cooperatively and efficiently with Goldstein, Borgen,
19 Dardarian & Ho on the investigation and filing of many class actions in California state court,
20 including the Apple case, and will continue to do so here.

21 4. Polina Brandler is also working on this case. She has nine years of experience. She
22 received her B.A. in history cum laude from the Macaulay Honors College at the City University of
23 New York in 2005, and her J.D. from the Benjamin N. Cardozo School of law in 2009. While in law
24 school, Ms. Brandler was an intern for the Honorable Sandra L. Townes of the Southern District of
25 New York, and was a volunteer for Sanctuary for Families advocating for abused partners and/or
26 spouses seeking orders of protection and/or uncontested divorces. After graduation, she clerked for the
27 Honorable Anita H. Dymant of the Appellate Division of the Los Angeles Superior Court from 2009 to
28

1 2012. During her time at HammondLaw, her practice has focused on wage and hour and consumer
2 class actions. Ms. Brandler is admitted to practice law in California and New York.

3 5. Ari Cherniak is a seventh-year associate working on this case. He received his B.S. in
4 Philosophy cum laude from Towson University in 2007, and his J.D. from Tulane Law School in 2011.
5 While in law school, Mr. Cherniak earned a citation for his extensive pro bono work in the Felony
6 Trial Unit of Baltimore City Office of the Public Defender. Since 2012, Mr. Cherniak's practice has
7 focused on wage and hour and consumer class actions. Mr. Cherniak is admitted to practice law in
8 California and Maryland.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct. Dated: May 1, 2019

11 By:

12 /s/ Julian Hammond

13 Julian Hammond

14 Attorney for Plaintiff Steven Breaux and Putative Class
15
16
17
18
19
20
21
22
23
24
25
26
27
28